CENTER FOR DRUG EVALUATION AND RESEARCH APPROVAL PACKAGE FOR: APPLICATION NUMBER

21-555

Chemistry Review(s)

NDA 21-555

Chlora Prep®

Medi-Flex Hospital Products, Inc.

Rao Puttagunta, Ph.D.

Division of Anti-inflammatory, Analgesic and Ophthalmic

Drug Products (HFD-550)



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Chemistry Review Data Sheet

Chemistry Review Data Sheet

- 1. NDA # 21-555
- 2. REVIEW #: 1
- 3. REVIEW DATE: 03-OCT-2002
- 4. REVIEWER: Rao Puttagunta, Ph.D.
- 5. PREVIOUS DOCUMENTS: N/A
- 6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed	Document Date
Original	10-DEC-2001
Amendment (BC)	30-SEP-2002
Amendment (BC)	02-OCT-2002
Amendment (BC)	03-OCT-2002

7. NAME & ADDRESS OF APPLICANT:

Name:

Medi-Flex Hospital products, Inc.

Address:

8717 West 110th Street, Suite 750

Overland Park, KS 66210

Representative:

Michael C. Beckloff, President & C.E.O.

Beckloff Associates, Inc.

400 West 110th Street, Suite 720

Overland Park, KS 66210

Telephone:

913-451-3955

8. DRUG PRODUCT NAME/CODE/TYPE:

- a) Proprietary Name: ChloraPrep®
- b) Non-Proprietary Name (USAN): Chlorhexidine Gluconate

Chemistry Review Data Sheet

c) Code Name/# (ONDC only): N/A

d) Chem. Type/Submission Priority (ONDC only):

• Chem. Type: 6

• Submission Priority: S

9. LEGAL BASIS FOR SUBMISSION: 505 (b)(1)

10. PHARMACOL. CATEGORY: Antiseptic

11. DOSAGE FORM: Solution

12. STRENGTH/POTENCY: 2% w/v

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: Rx X OTC

15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):

____SPOTS product - Form Completed

X Not a SPOTS product

16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

1,1'-hexamethylenebis[5-(p-chlorophenyl)biguanide] di-D-gluconate, $C_{22}H_{30}Cl_2N_{10} \cdot 2C_6H_{12}O_7$, Mol. Wt. 897.77





Chemistry Review Data Sheet

17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	ТҮРЕ	HOLDER	ITEM REFERENCED	CODE ¹	STATUS ²	DATE REVIEW COMPLETED	COMMENTS
	П		Chlorhexidine gluconate.	3	Adequate	5/04/99	

¹ Action codes for DMF Table:

1 - DMF Reviewed.

Other codes indicate why the DMF was not reviewed, as follows:

- 2 -Type 1 DMF
- 3 Reviewed previously and no revision since last review
- 4 Sufficient information in application
- 5 Authority to reference not granted
- 6 DMF not available
- 7 Other (explain under "Comments")

B. Other Documents:

DOCUMENT	APPLICATION NUMBER	DESCRIPTION
NDA	20-832	ChloraPrep

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Biometrics	N/A		
EES	Acceptable	9/17/02	J. D Ambrogio
Pharm/Tox	N/A		
Biopharm	N/A		
LNC	N/A		
Methods Validation	N/A		
OPDRA	N/A		
EA	Categorical Exclusion		
Microbiology	Approval	10/03/02	Bryan Riley

² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)



Chemistry Assessment Section

The Chemistry Review for NDA 21-555

The Executive Summary

ĭ	Re	co	m	me	nd	ati	ΛD	c
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A. Recommendation and Conclusion on Approvability

From the CMC standpoint this NDA is recommended for approval.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable

N/A

II. S

ummary of Chemistry Assessments
. Description of the Drug Product(s) and Drug Substance(s)
Drug substance:
Chlorhexidine gluconate, is manufactured by The CMC information for the drug substance is referenced to DMF.
Drug Product:
The Sepp® applicator consists of a glass ampoule containing 0.67 mL of solution enclosed in a plastic tube made of triple wall with a tip of foam
bonded to the plastic tube. The applicator is packaged in a blister pack.
The ampoule sizes 3.00 mL, 1.1 mL and 1.5 mL were previously approved under NDA 20-832 for the drug product.
The materials used in the Sepp® applicator and in the packaging are the same as in NDA 20-832. The formulation remains in contact with glass only. The current submission retains the same formulation and specification as in NDA 20-832. The submitted drug product stability data include duration of at 25°C and 6 months at 40°C for the 3.0 mL applicator containing chlorhexidine from the previous supplier An amendment dated 10/03/02 contains the stability data at 25°C for using the chlorhexidine from the current supplier The applicant proposed an expiration dating period of 24 months.



Chemistry Assessment Section

B. Description of How the Drug Product is Intended to be Used

The Sepp® applicator for chlorhexidine 2% (w/v) is used topically as an antiseptic for patient preoperative and preinjection skin preparation. This product is a single use, unit dose applicator with a volume per applicator of 0.67 mL of chlorhexine gluconate 2% (w/v).

At the time of use, the glass ampoule is crushed by finger-tip compression of the molded plastic tube. Broken glass pieces are retained by the applicator tip. Holding the applicator tip down and with a small degree of pressure, the tip is saturated with solution allowing transfer of solution to the skin. The Sepp® applicator is supplied in a blister package.

Recommended storage conditions: 20-25°C (68-77°F).

C. Basis for Approvability or Not-Approval Recommendation

The CMC information of the drug substances chlorhexidine gluconate, referenced to DMF This DMF has been reviewed and found adequate. The test methods for the drug substance were referenced to NDA 20-832 (approved 7/14/00).
In-process, release and stability acceptance criteria for the drug product were referenced to NDA 20-832. The packaging materials were also referenced to NDA 20-832.
The submitted drug product stability data on 3.0 mL applicator for chlorhexidine from and with chlorhexidine from (amendment dated 10/03/02) conform to the established acceptance criteria. The applicant also provided stability data on the reserve samples from seven batches of the proposed 0.67 mL applicator for up to showing conformance with the acceptance criteria. The contact surface remains the Type I J USP in both applicators, the only difference being the ampoule size. The submitted stability data were considered adequate to support the proposed expiration dating period of 24 months.
The information on the t J validation for the Sepp®

applicators was found adequate by the microbiology reviewer Dr. Bryan Riley, after the applicant provided the results of the process validation (amendment dated 10/02/02).

The NDA 21-555 is recommended for approval based on the submitted CMC information.

III. Administrative

A. Reviewer's Signature	N/A
B. Endorsement Block	N/A
C. CC Block	N/A



Chemistry Assessment Section

Chemistry Assessment

I. DRUG SUBSTANCE

1. Description & Characterization

Adequate

a. Description

b. Characterization / Proof Of Structure

2. Manufacturer

Adequate

Establishment	Function
	Manufacturer of chlorhexidine gluconate, BP
	Distributor of chlorhexidine gluconate, manufactured by
4	Manufacturer of isopropyl alcohol. USP
	Manufacturer of isopropyl alcohol. USP
3	Distributor of isopropyl alcohol, USP
1	manufactured by

Evaluation: The original submission included the address of ______ but the EES has shown the location in _____ The applicant (represented by Ms. Brenda Schlenk of Beckloff Associates) was asked to clarify the discrepancy in a teleconference on 9/25/02. It was clarified that the address in is that of the corporate headquarters and the manufacturing facility is located in





Chemistry Assessment Section

The address of the manufacturing facility was provided (amendment dated 9/30/02). Adequate.

3. Synthesis / Method of Manufacture	Adequate
DMF	
4. Process Controls	Adequate
DMF (
5. Reference Standard	Adequate
NDA 20-832	
6. Regulatory Specifications / Analytical Methods	Adequate
NDA 20-832	
7. Container/Closure System for Drug Substance Storage	Adequate
DMF	
8. Drug Substance Stability	Adequate
DMF	

II. DRUG PRODUCT

1. Components/Composition

Adequate

Component	Amount/ Ampoule	Batch Formula (ampoules)	Concentration
Chlorhexidine Gluconate,	0.0134 g	– kg	2% w/v
Isopropyl Alcohol, USP	0.4690 g	— kg	70% w/v
Purified water, USP	0.6700 mL	— kg)	q.s.

It was indicated that the Components/composition and batch formula have remained the same as in NDA 20-832 (approved 7/14/00). The only change reported is the theoretical number of 0.67-mL ampoules that can be filled.





Chemistry Assessment Section

2. Specifications & Methods for Drug Product Ingredients

Adequate

It was stated that all raw materials, containers, closures, applicators, and labeling materials to be used in the manufacture of the product are tested per approved test methods and specifications and released by Medi-Flex Hospital Products, Inc., as referenced in NDA 20-832.

3. Manufacturer

Adequate

Establishment	Function
Medi-Flex Hospital Products, Inc. 19 Butterfield Trail El Paso, TX 79906	 Manufacturing, packaging, and labeling In-process testing, release testing and stability testing Testing and releasing of raw materials including container/closure components
	•

Evaluation: Medi-Flex is a currently approved manufacturing facility listed in NDA 20-832. was listed as the sterilization and sterility testing site in the original submission. EES has shown with the same CFN and address. The applicant (represented by Ms. Brenda Schlenk of Beckloff Associates) was asked to clarify the discrepancy in a teleconference on 9/25/02. It was clarified that there was a change of name for this establishment, but the same establishment is being used by the applicant (amendment dated 9/30/02)

4. Methods of Manufacturing and Packaging

Adequate

a. Production Operations

The manufacturing process for ChloraPrep® solution was stated to have not changed from that submitted in NDA 20-832.

Filling of Ampoules: The finished bulk solution is filled into a crushable glass ampoule made of USP to a target volume of 0.67 mL ± 10% according to the procedure submitted in NDA 20-832. The filled ampoules are sealed.

Applicator: After filling and sealing,	, the ampoule is placed in	*	plastic
tube made of triple-wall,	The tube is sealed at one	e end by.	~
to form a leak-proof bottom prior to i	insertion of the filled ampou	les. At the	other end,
an applicator tip of:		foam is be	onded to
the plastic tube.			



Chemistry Assessment Section

Packaging and Labeling: The applicator is packaged in a blister pack. One hundred (100) Sepp applicators are packed into each intermediate carton, 10 cartons are packed into a shipper, and labeled with the Master Shipper Label.

Sterilization: The packaged cartons are sterilization in the same manner as that used for the 3.0-mL swab-stick applicator submitted in NDA 20-832. The product is tested for chemical analysis and sterility before it is released for distribution.

b. In-Process Controls & Tests

In-process controls and tests were referenced to NDA 20-832. Fill variability: $0.67 \text{ mL} \pm 10\%$

c. Reprocessing Operations

N/A

5. Regulatory Specifications and Methods for Drug Product

Adequate

a. Sampling Procedures

N/A

b. Regulatory Specifications And Methods

Test	Acceptance Criteria
Appearance	Clear and colorless solution
Odor	Strong odor of alcohol
CHG	
PCA	NMT! —
IPA	

Analytical procedures used for the tests were referenced to NDA 20-832.

6. Container/Closure System	Adequate
The applicator consists of	glass ampoule containing 0.67 mL of
solution enclosed in	plastic tube made of triple wall with
a tip of	foam bonded to the plastic tube.
The applicator is packaged in a	blister pack.

CHEMISTRY REVIEW



Chemistry Assessment Section

Evaluation:

	The ampoule consists of the same Type I USP, and the same configuration as that used in the 3.0-mL swab-stick applicator submitted in NDA 20-832.
	The materials used in the plastic tube of the applicator, were stated to conform to the relevant CFR sections (21 CFR §175.105, 175.230, 175.300 and 177.1200, and §175.105, 177.1680 and 177.2600 respectively) for safety. These compounds are stated to have been used in the 3.0 mL applicator (NDA 20-832) by Mr. Charles Warner of Beckloff Associates in teleconference with the reviewer on 10/01/02.
	The used in the applicator tip were stated to be the same as that submitted in NDA 20-832.
	The materials used in the applicator and the blister package were stated to be the same as in NDA 20-832. Adequate.
7.	Microbiology Adequate
	The process validation was reviewed by Dr. Bryan Riley of the OPS Microbiology Team. He found the information adequate after the applicant submitted the results of the validation process in an amendment dated 10/02/02. For details see his reviews dated 10/02/02 and 10/03/03 in DFS.
8.	Drug Product Stability Adequate
	It was stated that the applicant has not manufactured the Sepps® containing the solution made from chlorhexidine supplied by However, the submission includes the stability data on batches (at 25°C and 6 months at 40°C) from an ongoing stability study for the ChloraPrep One-Step 3-mL applicator, from the previous supplier, in support of the proposed 0.67 mL Sepp® applicator. The annual report dated 8/15/02 to NDA 20-832 contains the long term stability data for for the 3.0 mL applicator with chlorhexidine from the current supplier,
	In an amendment dated 10/03/02 the applicant submitted the stability data at ambient temperature for up to, on reserve samples from batches of the 0.67 mL Sepp® applicators containing chlorhexidine supplied by The applicant (represented by Mr. Charles Warner of Beckloff Associates) was asked to clarify the size of these batches (teleconference on 10/03/02). The applicant's response was not received at the time of this review. The submitted data conform to the established acceptance criteria.



Chemistry Assessment Section

Evaluation: All the submitted stability data for both the applicators conform to the established acceptance criteria. The only difference between the primary containers (glass ampoules) for these two applicators is the size of the glass ampoule. Therefore the stability data on the 3.0 mL applicator were also considered adequate to support the stability of the proposed applicator. Adequate.

Stability Commitment:

The applicant commits to test the first three commercial batches of Sepp® ampoules containing chlorhexidine gluconate supplied by ______, at least one additional batch on annual basis thereafter according to the approved stability protocol through the expiration dating period. The results of the stability studies will be submitted in the Annual Reports.

The applicant committed to withdraw from the market any batches of the drug product found to fall outside the approved specifications. It was also stated that any change or deterioration in the distributed drug product would be reported in compliance with 21 CFR 314.81(b)(1)(ii).

Evaluation: Adequate

Expiration Period:

The applicant proposed a 24-month expiration dating period (amendment dated 10/02/02).

Evaluation: The submitted stability data on the 3.0 mL applicator(NDA 20-832)
using chlorhexidine from the — suppliers (— — and the stability data on the proposed 0.67 mL applicator (— — conform to the acceptance criteria. The formulation is in the ampoule and is in contact only with the glass surface in both the applicators, the only difference being the size of the ampoule. The submitted stability data were considered adequate to

III. INVESTIGATIONAL FORMULATIONS

support the proposed expiration dating period. Adequate.

N/A





Chemistry Assessment Section

IV. ENVIRONMENTAL ASSESSMENT

Adequate

The applicant claimed a categorical exclusion from preparing an environmental impact statement under 21 CFR§25.31(b), stating that the Expected Introduction Concentration into the aquatic resources is <1ppb based on the fifth-year marketing projections.

This information was submitted in an amendment dated 9/30/02 in response to a teleconference with the sponsor (represented by Mr. Charles Warner of Beckloff Associates) on 9/26/02. Adequate.

V. METHODS VALIDATION

The analytical procedures were referenced to NDA 20-832, and no new regulatory analytical procedures were proposed.

VI. LABELING

The printed labeling is provided for the 0.67 mL Sepp® Applicator and carton:

The carton label contains Active Ingredients, Use, Warnings, Directions, Storage conditions, and Inactive Ingredients.

Active Ingredients	Purpose
Chlorhexidine gluconate 2% w/v	Antiseptic
Isopropyl alcohol 70% v/v	Antiseptic

Inactive ingredients

USP purified water

Storage: 20 - 25°C (68 - 77°F)

Evaluation: The labeling is reviewed by the Division of Over the Counter Drug Products (HFD-560).

VII. ESTABLISHMENT INSPECTION

Overall recommendation from the Office of Compliance has been received on 9/17/02 for all the establishments listed in the submission, as acceptable. EER summary report is attached with this review.

VIII. DRAFT DEFICIENCY LETTER





2

Chemistry Assessment Section

02-OCT-2002

Decision:

Reason:

ACCEPTABLE

BASED ON PROFILE

FDA CDER EES Page 1 of ESTABLISHMENT EVALUATION REQUEST SUMMARY REPORT

Application: Stamp: 12-DE Applicant:	NDA 21555/000 C-2001 Regulatory Du MEDI FLEX HOSP 19 BUTTERFIELD T EL PASO, TX 79906	RAIL	Dosage For	e: CHLORAPREP Name: me: CHLORHEXIDINE GLUCONATE m: SOL (SOLUTION)
FDA Contacts:	T. FRAZIER R. PUTTAGUNTA J. SMITH	(HFD-560) (HFD-550) (HFD-550)		2% & 4% 2 , Project Manager 6 , Review Chemist 9 , Team Leader
Overall Reco				
ACCEP	TABLEon 17-SEP-	-2002by J. D Al	MBROGIO	(HFD-324)301-827-0062
Establishment:			DMF No: AADA No:	
	OAI Status: NONE OC RECOMMEND 17-SEP-2002 ACCEPTABLE BASED ON PROFIL	ATION	onsibilities: .	
Establishment:	1641653 MEDI FLEX HOSP F 19 BUTTERFIELD T EL PASO, TX 79906		DMF No: AADA No:	
Last Milestone: Milestone Date: Decision:	OAI Status: NON OC RECOMMENDA 17-SEP-2002 ACCEPTABLE ICT RECOMMENDA	ATION	FI FI FI	NISHED DOSAGE LABELER NISHED DOSAGE MANUFACTURER NISHED DOSAGE PACKAGER NISHED DOSAGE RELEASE TESTER NISHED DOSAGE STABILITY TESTER
Establishment:			DMF No: (
Profile: CSN Last Milestone: Milestone Date:	OAI Status: NON OC RECOMMENDA 17-SEP-2002		nsibilities:	

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/s/

Rao Puttagunta 10/4/02 10:10:29 AM CHEMIST

John Smith 10/4/02 10:23:01 AM CHEMIST

PUBLIC HEAL	RIMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION REQUEST FOR CONSULTATION		TATION		
(Division/Office):	5 (PKLN)		FROM: Rao Puttagunta, Revie	w Chemist, HFD-830/550	
DATE August 21, 2002	IND NO.	NDA NO. 21-555	TYPE OF DOCUMENT Microbiology consult	DATE OF DOCUMENT 12/10/01	
NAME OF DRUG Chloraprep (chlorhexid	line gluconate, 2%)	PRIORITY CONSIDERATION	CLASSIFICATION OF DRUG Topical Solution	DESIRED COMPLETION DATE 9/21/02	
NAME OF FIRM: Medi-Fle	x Hospital Products, I	nc.			
		REASION FOR REC	QUEST		
	**·····	I. GENERAL	·	· · · · · · · · · · · · · · · · · · ·	
☐ NEW PROTOCOL ☐ PROGRESS REPORT ☐ NEW CORRESPONDENCE ☐ DRUG ADVERTISING ☐ ADVERSE REACTION REI ☐ MANUFACTURING CHAN ☐ MEETING PLANNED BY	PORT	☐ PRE-NDA MEETING ☐ END OF PHASE II MEETING ☐ RESUBMISSION ☐ SAFETY/EFFICACY ☐ PAPER NDA ☐ CONTROL SUPPLEMENT	☐ FINAL PRINTE! ☐ LABELING REV ☐ ORIGINAL NEV ☐ FORMULATIVE ■ OTHER (SPECIAL)	VISION V CORRESPONDENCE E REVIEW FY BELOW):	
			configuration sterilization	for the current	
		II. BIOMETRIC			
STATISTICAL EVALUATION	BRANCH		STATISTICAL APPLICATION BRAN	СН	
☐ TYPE A OR B NDA REVIEW SND OF PHASE II MEETING ONTROLLED STUDIES PROTOCOL REVIEW ☐ OTHER (SPECIFY BELOW):		☐ CHEMISTRY REVIEW ☐ PHARMACOLOGY ☐ BIOPHARMACEUTICS ☐ OTHER (SPECIFY BELOW):			
		III. BIOPHARMACE	CUTICS		
□ DISSOLUTION □ BIOAVAILABILTY STUDIES □ PHASE IV STUDIES		☐ DEFICIENCY LETTER RESPONSE ☐ PROTOCOL-BIOPHARMACEUTICS ☐ IN-VIVO WAIVER REQUEST			
·		IV. DRUG EXPERI	ENCE		
☐ PHASE IV SURVEILLANCE ☐ DRUG USE e.g. POPULATIO ☐ CASE REPORTS OF SPECIO ☐ COMPARATIVE RISK ASSI	ON EXPOSURE, ASSOCIA FIC REACTIONS (List belov	TED DIAGNOSES v)	☐ REVIEW OF MARKETING EXPER ☐ SUMMARY OF ADVERSE EXPER ☐ POISION RICK ANALYSIS		
		V. SCIENTIFIC INVEST	IGATIONS	<u></u>	
D CLINICAL	· · · · · · · · · · · · · · · · · · ·	**************************************	PRECLINICAL		
COMMENTS/SPECIAL INST The applicant is proposing 1.1 mL. It is stated that th Please contact me at 7-2. Rao Puttagunta, Review	g a new applicator with e 296 if you have questi	process and site remain	7 mL). Approved applicator amp in the same, with a "slightly" diff		
'GNATURE OF REQUESTER			METHOD OF DELIVERY (Check one) MAIL HAND		
SIGNATURE OF RECEIVER		SIGNATURE OF DELIVERER			

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Rao Puttagunta 9/12/02 11:23:26 AM CHEMIST



2

Chemistry Assessment Section

02-OCT-2002

Reason:

BASED ON PROFILE

FDA CDER EES Page 1 of ESTABLISHMENT EVALUATION REQUEST SUMMARY REPORT

Application: Stamp: 12-DE Applicant:	NDA 21555/000 C-2001 Regulatory Du MEDI FLEX HOSP 19 BUTTERFIELD T EL PASO, TX 79906		Dosage Form:	CHLORHEXIDINE GLUCONATE SOL (SOLUTION)
FDA Contacts:	T. FRAZIER R. PUTTAGUNTA J. SMITH	(HFD-560) (HFD-550) (HFD-550)	301-827-2296	2% & 4% , Project Manager , Review Chemist , Team Leader
Overall Recor		2002by J. D AN	ИBROGIO (H	IFD-324)301-827-0062
Establishment:			DMF No: AADA No:	
	OAI Status: NONE OC RECOMMEND 17-SEP-2002 ACCEPTABLE BASED ON PROFII	ATION	nsibilities:	
Establishment:	1641653 MEDI FLEX HOSP P 19 BUTTERFIELD T EL PASO, TX 79906		DMF No: AADA No:	
Last Milestone: Milestone Date: Decision:		TION	FINIS FINIS FINIS	HED DOSAGE LABELER HED DOSAGE MANUFACTURER HED DOSAGE PACKAGER HED DOSAGE RELEASE TESTER HED DOSAGE STABILITY TESTER
Establishment:			DMF No: (
Profile: CSN Last Milestone: Milestone Date: Decision:	OAI Status: NON OC RECOMMENDA 17-SEP-2002 ACCEPTABLE	• ·	nsibilíties:	

Establishment Information Medi-Flex Hospital Products, Inc.

Corporate Offices:	8717 West 110 th Street, Suite 750 Overland Park, Kansas 66210		
	Telephone: WATTS:	913-451-0880 800-523-0502	
	Telefax:	913-451-8509	
Site Functions:			
Contact:	Beckloff Associat Commerce Plaza I 7400 West 110 th S Overland Park, Ka Telephone: Telefax:	II, Suite 720 Street	
Manufacturing Facilities:	#19 Butterfield Tr		
	El Paso, Texas 79 Telephone: WATTS: Telefax:	906 915-778-6421 800-742-0473 915-778-6425	
Establishment Registration Number:	1641653		
Site Functions:		,	
	./		
Contact:	Beckloff Associates, Inc. Commerce Plaza II, Suite 720 7400 West 110 th Street Overland Park, Kansas 66210 Telephone: 913-4 Telefax: 913-4		
<u>Warehouse Facilities</u> :	#24 Concord El Paso, Texas 799 Telephone: Telefax:	913-451-3846 906 915-778-6477 915-778-6495	
Site Functions:		, · - ·	
Contact:	Beckloff Associate Commerce Plaza I 7400 West 110 th S Overland Park, Ka Telephone: Telefax:	I, Suite 720 treet	

No Review Required

Review Completed on Product in Orig NOA 20-832 appeared Quely 2000